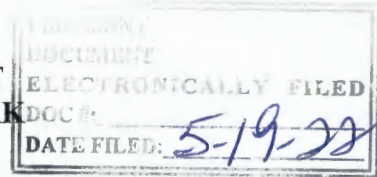


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



| | | |
|-----------------------------------|---|-------------------------|
| In Re Application of |) | |
| |) | |
| Webuild S.p.A. and Sacyr S.A., |) | |
| |) | |
| <i>Applicants,</i> |) | |
| |) | Misc. Action No. 22-140 |
| To Obtain Discovery for Use in an |) | |
| International Proceeding |) | |

~~[PROPOSED]~~ ORDER GRANTING
WEBUILD S.P.A. AND SACYR S.A.'S *EX PARTE* APPLICATION FOR AN ORDER
UNDER 28 U.S.C. § 1782 TO OBTAIN DISCOVERY FROM WSP USA
FOR USE IN AN INTERNATIONAL PROCEEDING

This matter comes before the Court on the *Ex Parte* Application of Webuild S.p.A. ("Webuild") and Sacyr S.A. ("Sacyr") for an Order to Obtain Discovery under 28 U.S.C. § 1782 from WSP USA for use in an international proceeding. Having fully considered Webuild and Sacyr's submissions and good cause appearing therefore,

IT IS HEREBY ORDERED that:

1. The *Ex Parte* Application of Webuild and Sacyr is GRANTED;

2. Petitioners are granted leave to ~~use~~ obtain from the Clerk and serve a subpoena for documents in

substantially the same form as Exhibit 1 to the Declaration of Carolyn B. Lamm,

directing WSP USA to produce the materials requested in the subpoena at the offices of

White & Case LLP, c/o Carolyn B. Lamm, 1221 Avenue of the Americas, ~~701 Thirteenth Street N.W., Washington,~~

NY NY 10020

~~D.C. 20005~~, and/or another location mutually agreeable to Webuild, Sacyr, and WSP

USA.

The subpoena shall require

3. WSP USA ~~shall~~^{to} produce the requested documents within (30) days of service of the subpoena, or such other dates as agreed between the parties, and in conformity with the Federal Rules of Civil Procedures and the Local Rules of the United States District Court for the Southern District of New York.

~~4. Until further Order by this Court, WSP USA shall preserve all documents, electronic or otherwise, and any evidence in its possession, custody, or control that contain information potentially relevant to the subject matter of the foreign proceeding at issue in the Application.~~

SO ORDERED

Signed this 19th day of May 2022

Ann A. Kaplan
U.S. District Judge